

IN THE UNITED STATES DISTRICT  
COURT FOR THE SOUTHERN DISTRICT  
OF TEXAS HOUSTON DIVISION

---

UNITED STATES OF AMERICA §  
§  
V. § CASE NO . H18-MJ-384  
§  
TOKISHIA BRUNO §  
§

**MOTION TO WITHDRAW AS COUNSEL**

NOW COMES Tokishia Bruno, by and through her current attorney of record, Jeffery C. King, and brings this Motion to Withdraw requesting that the Court grant permission for counsel to withdraw from further representation of Defendant in the above styled and numbered case, and in support thereof would respectfully submit the following:

The engagement agreement between Ms. Bruno and present counsel provided for counsel's compensation to be within reasonable standards for this type of case. It was anticipated that Ms. Bruno would be financially able to eventually afford counsel through a trial. Unfortunately, because of unforeseen circumstances and due to Ms. Bruno's current financial situation, she no longer has the ability to retain counsel. Ms. Bruno is making minimal income, therefore lacks the finances to afford the legal fees of an attorney.

Undersigned counsel is unable to continue in the representation without the defendant's financial ability to compensate counsel and fulfill additional costs of case administration.

WHEREFORE, PREMISES CONSIDERED, Jeffery King, respectfully requests this Honorable Court issue an order authorizing undersigned counsel to be relieved of the responsibility as counsel of record for the Defendant in the above-style and numbered cause, and that Defendant be appointed counsel to represent her.

Respectfully submitted,

/s/ Jeffery C. King  
Jeffery C. King  
State Bar Number: 24038039  
2626 Cole Ave. Suite 415  
Dallas, Texas 75204  
Telephone: (469) 399-7001  
Fax: (469) 399-7002  
jeff@jeffkinglaw.com  
**Attorney for Defendant**

AGREED TO BY:

  
\_\_\_\_\_  
Tokishia Bruno

Date: 6/19/18

CERTIFICATE OF CONFERENCE

I hereby certify that on June 14, 2018, I conferred with Assistant United States Attorney Michael Chu and he indicated via email that the Government is NOT OPPOSED to the relief sought herein.

/s/Jeffery King  
JEFFERY C. KING

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2018, I caused a true and correct copy of the foregoing Motion to be served upon all counsel of record by filing same via ECF.

/s/Jeffery King  
JEFFERY C. KING